

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	MM Docket No. 99-25
)	
Creation of a Low)	RM-9208
Power Radio Service)	RM-9242

COMMENTS OF INTERNATIONAL BROADCASTING NETWORK

International Broadcasting Network (IBN) hereby submits its comments in response to the Commission's Notice of Proposed Rule Making in the above-captioned proceeding.

I.

IBN strongly supports the Commission's proposal to create a low power radio service. In view of the increasing concentration of ownership and control that is taking place in broadcasting, the establishment of such a service is of crucial importance and clearly in the public interest. The service should be created without delay.

II.

It is exceedingly important that the low power radio service afford an opportunity for new radio networks to be organized and to grow and expand. Accordingly, IBN urges that the low power radio service not be hampered with arbitrary limits on the number of stations that a single entity can own or requirements pertaining to residency. Any requirement that an applicant or licensee reside within a stated distance of the station would be inappropriate and difficult, if not impossible, to enforce. In an era of mobility, individuals often have multiple residences and frequently move from one area to another. Furthermore, in an age of instant communication, there is no reason to believe that such a requirement would serve any worthwhile purpose. Moreover, the application of any such requirement to associations, partnerships or corporations would pose special problems.

III.

Low power radio stations should be allowed to operate with sufficient levels of power and adequate antenna height to make them viable competitors in the marketplace. IBN favors permitting such stations to broadcast at an effective radiated power of up to 3,000 watts and with a center of radiation of up to 100 meters above ground level.

IV.

It is essential that low power radio stations be accorded primary status and given the same license renewal opportunities as other classes of stations. The cost of building and operating such a station will typically be much greater than many presently estimate. For a variety of reasons, including the monopolistic practices of huge nationwide tower companies, the costs of operating any type of station are spiraling upward at an astounding pace. It is no longer prudent or economically feasible to build any kind of

station that has secondary status and is subject to displacement. The valuable public service low power radio stations will provide should not be unnecessarily jeopardized by secondary status and the threat of displacement.

V.

Although IBN is a publicly-supported exempt organization under Section 501(c)(3) of the Internal Revenue Code, it favors opening up the opportunity for low power radio station ownership to as many different kinds of applicants as possible. In no event should the low power radio service be restricted to educational institutions. If there is to be any preference for noncommercial applicants, such a preference should apply equally to all nonprofit entities.

VI.

In accordance with the foregoing comments, IBN respectfully urges that the Commission promptly establish a low power television service and encourage its growth as a viable broadcasting service.

Respectfully submitted,

INTERNATIONAL BROADCASTING NETWORK

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